

Terrence J. Truax (*pro hac vice*)
Charles B. Sklarsky (*pro hac vice*)
Michael T. Brody (*pro hac vice*)
Gabriel A. Fuentes (*pro hac vice*)
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, Illinois 60654-3456
Telephone: (312) 222-9350
Facsimile: (312) 527-0484
ttruax@jenner.com
csklarsky@jenner.com
mbrody@jenner.com
gfuentes@jenner.com

ADDITIONAL COUNSEL IDENTIFIED ON
SIGNATURE PAGE

*Attorneys for Defendants Mitsubishi Electric Corporation,
Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual
Solutions America, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

CRAGO d/b/a DASH COMPUTERS, INC., et al.,
on its own behalf and on behalf of similarly situated
parties,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORPORATION, et al.,

Defendants.

MDL No. 1917

Case No. 3:14-cv-02058-JST

Master File No. 3:07-cv-05944-JST

**STIPULATION AND [~~PROPOSED~~] ORDER
REGARDING DATE TO SUBMIT EXPERT
REPORTS AND DATE FOR DPPS TO
RESPOND TO MITSUBISHI ELECTRIC
DEFENDANTS' MOTION FOR RELIEF
FROM NONDISPOSITIVE PRETRIAL
ORDER OF SPECIAL MASTER**

Judge: Hon. Jon S. Tigar

1 The undersigned Mitsubishi Electric Defendants and the Direct Purchaser Plaintiffs (“DPPs”)
2 have conferred and through their counsel, and subject to the Court’s approval, HEREBY STIPULATE
3 AS FOLLOWS:

4 WHEREAS on May 3, 2016, this Court set a number of pre-trial schedules in this case. As is
5 relevant to this stipulation, the Court directed the Mitsubishi Electric Defendants to submit rebuttal reports
6 of their expert witnesses on October 7, 2016. (Dkt. 4628, docketed May 4, 2016);

7
8 WHEREAS on September 28, 2016, the Court directed any parties, notably the DPPs, wishing to
9 respond to the Mitsubishi Electric Defendants’ Motion for Relief from Nondispositive Pretrial Order of
10 Special Master (Dkt. 4802), to do so before October 7, 2016 (Dkt. 4893);

11 WHEREAS the Court granted the parties’ stipulation filed on October 3, 2016 extending the
12 October 7, 2016 deadlines to October 21, 2016 (Dkt. 4920);

13
14 WHEREAS the Mitsubishi Electric Defendants and the DPPs continue to be engaged in settlement
15 discussions, and have made additional, substantial progress in resolving their dispute. They believe that
16 they will be able to resolve this case, such that it will be unnecessary for the Mitsubishi Electric Defendants
17 to submit expert reports or the DPPs to respond to the Mitsubishi Electric Defendants’ objections to the
18 Special Master’s Proposed Order;

19 WHEREAS the parties currently anticipate that they will make substantial progress in resolving
20 this dispute by November 21, 2016;

21
22 WHEREAS the parties further believe that progress will be advanced in this case if the Court
23 schedules the case for a status conference, the parties request that this matter be added to the agenda of the
24 previously scheduled hearing in this case on November 17, 2016 such that the parties can advise the Court
25 at that time whether the matter has been resolved and they may obtain the Court’s guidance if necessary;

26 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the undersigned
27 plaintiffs and defendants, and subject to the Court’s approval, that:

1. The October 21, 2016 deadlines shall be extended to November 21, 2016;
2. This matter may be added to the agenda of the November 17, 2016 status hearing in this case for the parties to advise the Court of the status of the case and obtain the Court's guidance if necessary.

IT IS SO STIPULATED

Dated: October 13, 2016

By: /s/ Michael T. Brody
Michael T. Brody

Terrence J. Truax
Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes

/s/ R. Alexander Saveri
Guido Saveri
R. Alexander Saveri
Geoffrey C. Rushing
Cadio Zirpoli
SAVERI & SAVERI, INC.
706 Sansome Street
San Francisco, CA 94111
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

*Lead Counsel for the Direct
Purchaser Plaintiffs*

**ADDITIONAL COUNSEL REFERENCED
FROM CAPTION PAGE**

Brent Caslin (Cal. Bar. No. 198682)
bcaslin@jenner.com
JENNER & BLOCK LLP
633 West Fifth Street, Suite 3600
Los Angeles, California 90071
Telephone: (213) 239-5100
Facsimile: (213) 239-5199

Harold A. Barza (Cal. Bar. No. 80888)
halbarza@quinnemanuel.com
Kevin Y. Teruya (Cal. Bar. No. 235916)
kevinteruya@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543

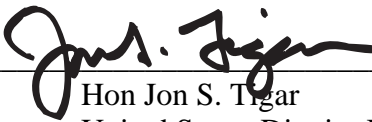
1 Telephone: (213) 443 3000
2 Facsimile: (213) 443 3100

3 Ryan S. Goldstein (Cal. Bar No. 208444)
4 ryangoldstein@quinnemanuel.com
5 QUINN EMANUEL URQUHART
6 & SULLIVAN, LLP
7 NBF Hibiya Building, 25F
8 1-1-7, Uchisaiwai-cho, Chiyoda-ku
9 Tokyo 100-0011, Japan
10 Telephone: +81 3 5510 1711
11 Facsimile: +81 3 5510 1712

12 *Attorneys for Defendants Mitsubishi Electric Corporation,*
13 *Mitsubishi Electric US, Inc., and Mitsubishi Electric*
14 *Visual Solutions America, Inc.*

15
16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Date: October 14, 2016

18
19
20
21
22
23
24
25
26
27
28

Hon Jon S. Tigar
United States District Judge